

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

WILLIAM BUTERA,
Plaintiff,

v.

FORT BEND COUNTY, TEXAS,
Defendant.

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CIVIL ACTION NO. H-11-0887

VERDICT FORM

QUESTION NO. 1

Do you find from a preponderance of the evidence that Plaintiff's April 6, 2009, protected speech before the Texas House Subcommittee on County Affairs was a motivating factor in Sheriff Wright's termination of Plaintiff's employment?

Answer "Yes" or "No": NO

If you answer "Yes" to Question No. 1, answer Question No. 2.

If you answer "No" to Question No. 1, sign and date this Verdict Form.

QUESTION NO. 2

Do you find from a preponderance of the evidence that Sheriff Wright's termination of Plaintiff's employment was the proximate cause of Plaintiff's damages?

Answer "Yes" or "No": _____

If you answered "Yes" to Question No. 2, answer Question No. 3.

If you answered "No" to Question No. 2, sign and date this Verdict Form.

QUESTION NO. 3

Do you find from a preponderance of the evidence that Sheriff Wright would have terminated Plaintiff's employment even in the absence of Plaintiff's protected speech before the Texas House Subcommittee on County Affairs?

Answer "Yes" or "No": _____

*If you answered "No" to Question No. 3, answer Question No. 4.
If you answered "Yes" to Question No. 3, sign and date this Verdict Form.*

QUESTION NO. 4

What amount of money do you find from a preponderance of the evidence would compensate Plaintiff for loss of wages proximately caused by the violation of his First Amendment right:

(a) Between June 2, 2010 and today? Answer: \$ _____

(b) Future wages: Answer: \$ _____

Answer Question No. 5.

QUESTION NO. 5

What amount do you find from a preponderance of the evidence would compensate Plaintiff for any mental anguish proximately caused by the violation of his First Amendment right:

(a) Between June 2, 2010 and today? Answer: \$ _____

(b) Future mental anguish: Answer: \$ _____

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